

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Revision of Part 22 of the
Commission's Rules Governing
the Public Mobile Services

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) CC Docket No. 92-115
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COMMENTS OF PAGING NETWORK, INC.

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SUMMARY

Paging Network, Inc. ("PageNet") herein comments on the Commission's Further Notice of Proposed Rule Making in the Part 22 rewrite proceeding ("*Further Notice*"). As the largest and most rapidly expanding provider of paging services in the United States, PageNet is exceptionally well-positioned to comment on the Commission's proposals, which will so directly affect the manner in which it conducts its business.

PageNet heartily supports the Commission's goals in issuing the *Further Notice* -- to streamline licensing procedures, reduce burdens on its staff and ensure prompt delivery of service to the public. Preliminarily, PageNet recommends an analytical framework under which each proposed rule revision can be judged. This framework, PageNet believes, should be comprised of simple principles: regulatory nominalism, careful cost/benefit analysis, delay reduction, and quick delivery to the public of the highest quality service at the lowest possible price.

Applying the fundamentals of the analytical framework, PageNet believes that four basic licensing principles emerge that should govern 931 MHz licensing and operations in order that the Commission's rules and procedures will not impede but will promote the growth and development of paging services:

- ° applications should be processed on a first-come, first-served basis;
- ° applications should be frequency-specific;
- ° an outside entity should be used to coordinate frequency assignments in the same way that 929 MHz paging applications are coordinated by NABER; and

- licensing should be done on a market area, rather than transmitter-by-transmitter, basis.

Therefore, PageNet strongly supports the Commission's proposal to adopt frequency-specific application procedures, which will clarify and simplify the licensing procedure and help to avoid mutual exclusivity, as mandated by the *Budget Act*. Consistent that mandate, the Commission would be extremely ill-advised in continuing to allow a filing window for the submission of competing applications as it has proposed to do. PageNet vigorously opposes the proposal, which is diametrically at odds with the goal of minimizing mutually exclusive applications. To decrease the potential for litigation and delay, first-come, first-served licensing procedures should be adopted, as proposed by the Commission in the initial Notice of Proposed Rule Making in this proceeding.

As a further mechanism to streamline the licensing process and speed service to the public, PageNet recommends the use of an outside frequency coordinator to assist in processing 931 MHz applications. Coordination by an outside entity such as NABER, as is done in licensing private carrier paging facilities, has been proven effective in reducing processing times.

Where mutually exclusive initial license applications do occur, and with respect to the backlog of pending applications filed prior to July 26, 1993, PageNet supports the Commission's proposal to award licenses by auction. In cooperation with other licensees and industry groups, it is continuing to evaluate the Commission's further proposals dealing with pending applications

and is attempting to develop a consensus approach to those proposals as well as to the issue of license modifications and how they should be defined and treated in cases of mutual exclusivity.

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To: The Commission

Paging Network, Inc. ("PageNet"), through its attorneys, hereby submits its comments in the above-captioned proceeding.^{1/} This further phase in the Commission's effort to comprehensively revise the rules governing the licensing and operation of common carrier mobile services coincides with its effort in GN Docket No. 93-252 to establish comparable regulatory approaches to the governance of common and private carrier services licensed under Parts 22 and 90 of the rules.^{2/} The thrust of both proceedings is identical in many respects and PageNet's comments here mirror, to a significant degree, those it is filing in the *Parity Proceeding*.

PageNet enthusiastically supports the Commission's goals in issuing the *Further Notice*. Succinctly stated, those goals are

- ° to streamline procedures for licensing facilities in the

1/ Further Notice of Proposed Rule Making, released May 20, 1994 (hereinafter "Further Notice").

2/ Concurrently herewith PageNet is submitting its comments in response to the Commission's Further Notice of Proposed Rule Making, released May 20, 1994, in GN Docket No. 93-252 (hereinafter "*Parity Proceeding*").

931 MHz band that provide messaging services to the public;

- ° to reduce processing and review burdens on the Commission's staff; and
- ° to ensure that licensees in the public mobile services are fully qualified to provide service to the public as expeditiously as possible.

As to the specific proposals contained in the *Further Notice*, PageNet strongly favors some of them, but believes that others, if adopted, will frustrate the achievement of the Commission's goals and therefore should be revised or rejected out of hand. PageNet is deferring substantive comment on several of the proposals pending its further review of those proposals and the outcome of industry efforts to develop a consensus position as to them.

Statement of Interest

PageNet is the largest and most rapidly expanding paging company in the United States. While it today provides both private and common carrier services to over 3 million subscribers, its longstanding common carrier infrastructure formed the basis for its early growth and success in the market. PageNet files approximately 70 Part 22 applications per month to support its existing systems as well as expansion into new markets. Its extensive experience in operating under the regulatory scheme set out in Part 22 places it in an exceptionally good position to evaluate the Commission's proposals in the *Further Notice* and to propose modifications which it believes will better advance the

Commission's ultimate aims for itself and its Part 22 paging licensees.^{3/}

I. INTRODUCTION

A. Analytical Framework

The *Further Notice* proposes to amend certain rules and procedures for initial licensing and subsequent expansion of 931 MHz paging systems. Consistent with the statutory mandate imposed by the Omnibus Budget Reconciliation Act of 1993 (the "*Budget Act*"), the Commission's stated goal in proposing these rule revisions is to minimize mutually exclusive applications in concert with maximizing the efficiency of its licensing process.

As the Commission notes, passage of the *Budget Act* and adoption of competitive bidding procedures, as well as the move to establish parity and a comparable regulatory framework for Part 90 and Part 22 service providers who are classified commercial mobile service providers, has imposed an overworking agenda on the initiatives begun two years ago in this proceeding. Thus, in responding to the Commission's proposals in the *Further Notice*, as well as its comments in the *Parity Proceeding*, PageNet believes it is vitally important initially to establish an analytical framework under which each rule revision can be judged. This analytical framework should be comprised of simple principles to which this Commission should steadfastly adhere, including:

^{3/} The *Further Notice* proposes revisions to Part 22 rules affecting cellular service providers, as well as paging service providers. PageNet's comments are limited to the latter subject where its experience lies.

- ° minimize and simplify regulation and its associated burdens where possible;
- ° apply a cost/benefit analysis to each proposed regulation;
- ° determine whether the costs imposed on the Commission, the regulated industry, and the public outweigh any real or perceived benefit of regulation;
- ° speed new and innovative services to the public; and
- ° adopt rules which minimize the potential for litigation or administrative or procedural delay.

B. Overview of 931 MHz Licensing Approach Under the Analytical Framework

The Commission has recommended a variety of discrete licensing and application processing procedures in the *Further Notice*. The following paragraphs provide an overview of PageNet's recommendations for licensing of 931 MHz paging operations contained herein, and create the contextual premises for its positions respecting the Commission's proposals.

Applying the fundamentals of the analytical framework, PageNet believes that four basic licensing principles emerge that should govern 931 MHz paging:

- ° applications should be processed on a first-come, first-served basis;
- ° applications should be frequency-specific;
- ° an outside entity should be used to coordinate frequency assignments in the same way that 929 MHz paging

applications are coordinated by NABER; and

- ° licensing should be done on a market area, rather than transmitter-by-transmitter, basis.

In this manner, PageNet believes the Commission's licensing mechanisms will not impede but will promote the growth and development of paging services.

1. First-come, First-served

PageNet believes that the filing of applications on a first-come, first-served basis would minimize the regulatory burden on both the applicant and the Commission.^{4/} The applicant would not have to submit to the auction processes, nor dedicate the time and resources necessary even to intelligently participate in the auction. The Commission, and ultimately the public, would not have to bear the administrative costs of holding the auction. Neither would the applicant be required to have its application put on public notice for the purpose of soliciting competing applications nor would it suffer the further delays both of the additional 30-day petition period for competing applications and of the auction process itself should the application ultimately become MXd.^{5/} Here, clearly, the costs and other burdens imposed

^{4/} Part 90 private paging licensees already benefit from these procedures. See, e.g., § 90.495(f).

^{5/} Of course, the application would need to be put on public notice for petition to deny purposes. To the extent that the statutory 30-day notice period for petitions to deny is coincident with the period for filing competing applications, that portion of the Commission's proposal might not inherently cause delay. However, it is not clear that the two periods would run concurrently, given the procedures established for competitive bidding.

on the Commission, the applicant and the public (which ultimately bears the costs associated with obtaining the license) outweigh any perceived benefit to permitting competing applications to be filed.

Indeed, PageNet is aware of no public benefit to be attained by retention of a filing window for competing applications for 931 MHz paging services. The only entity potentially benefitted is the party filing a competing application. However, that party had the opportunity to file an application at any time prior to the time the initial applicant filed and chose not to do so. Certainly, the applicant whose business plan did include filing for a license, and providing service to the public, should not have its business plans stymied because a competing applicant sat back, unwilling to make a commitment to file an application or serve the public in the subject region until it was forced to do so by another.

None of these delays (or costs) are associated with first-come, first-served processes.^{6/} As demonstrated by experience in the licensing of Part 90 systems, first-come, first-served frequency-specific procedures work with only minimal regulatory or applicant cost. There is virtually no delay. The applicant typically is issued a license by the Commission within 30 days of

^{6/} First-come, first-served may, in fact, be the licensing means most commonly used in paging today. Part 90 frequencies have seen substantial recent licensing activity, while the Part 22 frequencies, given their relative maturity, have seen far less.

an application being submitted to NABER, with concomitant prompt service to the public.

2. Frequency Coordination

Under current procedures, the Commission performs frequency coordination and assigns 931 MHz frequencies. PageNet suggests that the Commission adopt procedures for outside coordination of 931 MHz applications for initial and modified licenses, comparable to those used for 929 MHz private carrier applications.^{7/}

Outside coordination would relieve the Commission of a significant burden and expense it now bears in having to process these applications. Based on the history of outside coordination by NABER, such an approach would speed processing times and thereby speed service to the public.

3. Market Area Licensing

PageNet has been an avid proponent of market area licensing since the initial phases of this proceeding. Adoption of a Commission-defined market area licensing scheme takes into account the realities of the marketplace. The needs of the public vary over a continuum for local service through wide area and regional coverage to complete nationwide paging. Throughout PageNet's history, its customers have demanded greater geographic coverage with each passing year. In order for this continuum of service to be provided to the public in the most cost-effective manner, it must be carried over a common infrastructure. A market area licensing scheme facilitates the development of such systems.

^{7/} Part 90 provides for use of an outside entity, i.e., NABER, to coordinate frequency assignments.

Local users demand solid coverage and intense transmitter density in urban areas, while regional users insist upon the broadest possible geographic coverage. Under market area licensing, the provision of service to the widest possible variety of users will spread the costs over a greater number of pagers and minimize the cost of service to the end user.

Both carriers and the Commission will achieve substantial administrative savings from this approach. The diminution in the number of applications to be prepared by applicants and processed by the Commission reduces the work load on each.

Adopting market area licensing for Part 22 931 MHz licenses would also increase opportunities for channel aggregation across all 900 MHz frequencies in a common service area, enabling providers to develop a common, multiple-frequency infrastructure. This would reduce carrier costs, again facilitating expeditious service to the public at a lower price. In addition, a consistent licensing scheme will facilitate carriers' ability to structure management and sales for all services on a market basis, as the market demands now, making carriers better able to serve the needs of their individual customers.

4. Frequency-Specific Applications

As discussed below, PageNet supports the Commission's proposal to require applicants to specify their intended frequency of operation in filing their license or modification application. Such an approach reduces the likelihood of mutual exclusivity and the resultant costs and delays in implementation of a new service.

In summary, PageNet proposes to combine the first-come, first-served licensing procedure, with frequency-specific applications, on a geographic basis such as Rand McNally Major Trading Areas ("MTAs") rather than on a transmitter-by-transmitter basis. This recognizes the fact that modern paging systems are developing on a regional, market-wide basis and provides for an efficient, inexpensive and fast method of system expansion. By moving to frequency-specific applications and a first-come, first-served regime, the incidence of truly mutually exclusive applications will be reduced to the vanishing point with an application being mutually exclusive only if it is co-channel and is received by the Commission on the same day as the application with which it is in conflict. Only then should the Commission resort to competitive bidding. These procedures offer the most efficient and cost effective licensing mechanism with the best chance of providing service to the public upon demand.

II. DISCUSSION

The *Further Notice* contains specific proposals for future licensing of 931 MHz paging facilities and for resolving the backlog of applications that has developed in certain major markets where frequencies are no longer readily available. Recognizing that existing rules "no longer permit efficient processing of applications," the Commission proposes amendments in what it claims is "a further effort to minimize mutually exclusive applications." *Further Notice* at ¶ 12. PageNet is gravely concerned that, in fact, certain of the amendments the Commission

is proposing will substantially increase, rather than decrease, the probability of mutual exclusivity between applications, will create massive uncertainty in the marketplace, will disrupt business plans and place system expansion projects at intolerable risk, will delay the implementation of service, and will tremendously increase costs to the Commission, licensees and the public. Thus PageNet recommends that alternative approaches to these proposals be adopted, consistent with the licensing framework described above.

A. Frequency Assignment Procedures

The Commission proposes to abandon the block allocation approach currently used to assign 931 MHz paging frequencies and to adopt instead a rule requiring applicants to specify the frequency of operation in their applications. The requirement that applications be filed on a frequency-specific basis would apply both to applications filed after the adoption of the new rules and those currently pending, including all contested granted, dismissed and denied applications. In addition, the frequency requested must be available at the time the application is filed. *Id.* at ¶ 16.

As stated above, PageNet heartily supports the move to frequency-specific applications. To do so will clarify and simplify the licensing procedure, focus the mutual exclusivity analysis more cleanly, and will place the burden of the initial frequency availability assessment on the applicant, where it belongs. The ability of applicants to file "generic 900 MHz"

paging applications has proven to be unworkable, particularly in congested markets where the legitimate efforts of some licensees to expand on frequencies for which they are already licensed have been frustrated due to being deemed mutually exclusive with a "generic" application. Frequency-specific applications will help to avoid mutual exclusivity, as required by the Budget Act, and should be adopted.

**B. Public Notice and Competing
Application Filing Window**

The *Further Notice* proposes that applications accepted for filing will be placed on public notice for a period of 30 days to permit the filing of petitions to deny and competing applications. *Id.* Applications for co-channel facilities within 70 miles of the first-filed application would be deemed mutually exclusive. *Id.* at n.26.

PageNet vigorously opposes the proposal to retain an extended filing window for the submission of competing applications. The approach is diametrically at odds with the Congressional mandate to minimize mutually exclusive applications. So long as the rules provide a mechanism whereby licensees can practice a game of "wait and see," filing applications defensively in response to another's proposal to serve the market, rather than pro-actively in response to the market's demand, the number of mutually exclusive applications will not be optimally reduced, service to the public will not be optimally enhanced, and costs to the FCC, to licensees and to the public will be unjustifiably increased.

The Commission's proposal to reduce the filing window to 30 days from its current 60 days is a step in the right direction but it ignores the fundamental objectives, stated above, which should guide the Commission's decisions -- to streamline procedures, reduce processing delays and burdens, and ensure expeditious service to the public. Retention of the filing window will, instead, increase the potential for litigation and administrative or procedural delay and must, therefore, be rejected as a part of the licensing scheme. The only approach which fully promotes the public interest in having the spectrum efficiently used and in receiving cost-effective services is the first-come, first-served procedure recommend by the Commission in the initial Notice of Proposed Rule Making in this proceeding. For all the reasons stated earlier, PageNet strongly supports adoption of first-come, first-served licensing procedures. No reason has been offered and, indeed, PageNet can think of none that could be, that would warrant the Commission's reversal from its earlier proposal.

C. Treatment of Pending Applications

The Commission proposes that applicants having pending applications, including applications which have been granted, dismissed or denied but are subject to petitions for reconsideration or applications for review, would be required to amend their applications to specify a frequency and would be considered mutually exclusive, on a one-time-only basis, with co-channel applications either previously filed or filed within 60 days of the effective date of the new rules.

PageNet is in the process of evaluating the effect of the Commission's proposal with respect to the backlog of 931 MHz applications. It is vitally concerned that the procedure adopted be one that results in the quickest and most efficient resumption of licensing on the remaining frequencies in the most congested markets. In cooperation with PCIA and other licensees in the industry, it is attempting to develop a consensus approach to the treatment of pending applications and will comment as to the outcome of those efforts and on the underlying issue in its reply comments.

**D. Method of Selection as Between
Mutually Exclusive Applications**

The Commission proposes several rules and procedures designed to implement the requirement imposed by the *Budget Act* to use competitive bidding/auction procedures to the extent possible to select between mutually exclusive applications. Specifically, it proposes auctions where there are mutually exclusive applications for initial licenses. *Id.* at ¶¶ 16, 18. In the context of disposing of backlogged applications, it seeks comment, in addition, on whether auctions should be used where the applications were filed prior to July 26, 1993 or where the mutually exclusive applications include both pre- and post-July 26, 1993 filings. In the latter two instances, the Commission has discretion to use lottery procedures, if it determines that to do so would best serve the public interest. *Budget Act* at § 6002(e)(2).

The use of auctions to choose between or among competing applications for initial licenses is mandated by the statute. Similarly, on the question of whether auctions or lotteries should be used to resolve conflicts between backlogged applications filed prior to July 26, 1993, PageNet believes that auctions will more generally assure that frequencies are licensed to entities most ready, willing and able to maximize their use in providing service to the public. Even in the narrow context of long-pending applications in congested markets, it would be unwise and inappropriate in PageNet's view to submit the outcome of the licensing procedure to chance when it is not legally required. For example, in the case of mutually exclusive applications filed prior to July 26, 1993, where one was initially filed as a generic 900 MHz request for a new frequency and the other was a request to expand on a frequency for which the applicant was already licensed in an adjoining market area, the process used to choose between the two applications, assuming both specified the same frequency in their amended applications, should allow both applicants to place a value on the spectrum and bid for it accordingly. If the frequency is of greater value to the existing licensee attempting to expand its system, awarding the frequency by lottery to the other applicant would make no sense. First, it could fail to place the spectrum where it would be put to best use and second, could result in compromising the quality of service which the first licensee in the area would be able to provide.

In summary, while PageNet urges the Commission to adopt general licensing rules, i.e., first-come, first-served filing

procedures, that will reduce to the maximum extent possible the number of mutually exclusive applications, where MXd applications nevertheless occur, it supports the use of auctions, wherever possible, to resolve the conflicts.

**E. Definition of Modification and
Treatment of Mutual Exclusivity**

Finally, the Commission seeks comment on its proposal to narrowly restrict applications that will qualify as "modifications,"^{8/} to treat applications that fail to meet the test as "initial" license applications, and to resolve conflicts between such initial applications by using auctions.

PageNet believes that the proposal to treat as an initial application any modification which would locate a transmitter more than two kilometers from an existing transmitter on that frequency is nonsensical. Interpreted literally, this provision would require an application proposing the addition of sites wholly within the licensee's existing service area to be put on public notice. There is no rational purpose to be served by such a requirement.

^{8/} The Commission has proposed to limit "modifications" to those applications which

- (1) propose new locations two kilometers or less from a previously authorized and fully operational co-channel base station licensed to the same applicant;
- (2) propose a change of location within two kilometers of an existing co-channel station licensed to the same applicant; or
- (3) propose a technical change that would not increase the service contour.

In its Further Notice in the *Parity Proceeding*, the Commission has proposed the same definition of "modification" and "initial" applications, as well as proposing to apply the current Part 22 standard for "major" and "minor" applications and amendments, to Part 90 CMRS providers. Whatever definitions the Commission adopts, the ultimate impact on current and future licensees will be made more rational, and the number of mutually exclusive applications will be minimized, if the overall licensing scheme is first-come, first-served.

As with the Commission's proposed mechanism for dealing with the backlog of pending applications, PageNet is continuing to evaluate this issue, in concert with other licensees and industry groups, in an effort to develop a consensus which can be presented and addressed in reply comments.

**F. Treatment of Mutually Exclusive
Modification Applications**

Even allowing for the Commission's narrow definition of "modification" and a first-come, first-served rule, there remains the possibility of two modifications being filed on the same day that would prove mutually exclusive. While the probability of such an occurrence is small, provision should be made for dealing with the eventuality. The Commission asserts that comparative hearings would be used to determine which application should be granted. *Further Notice* at ¶ 18.

PageNet opposes the use of comparative hearings under any and all circumstances. Such proceedings constitute the most protracted mechanism of all for choosing a winning applicant,

consuming vast amounts of time, money and human resources on the part of both the competing applicants and the Commission staff. They should be avoided at all cost.

Instead the Commission should, pursuant to Section 6002(e)(1) of the *Budget Act*, utilize lotteries to resolve conflicts between competing modification applications. The public interest in receiving service with the least amount of delay and at the lowest possible cost provides appropriate justification for implementation of the lottery procedure in this narrow context.

III. CONCLUSION

PageNet supports the Commission's goal of revising the rules governing the licensing of 931 MHz paging systems to make them more streamlined, to reduce processing and review burdens on the Commission's staff, and to speed service to the public. Therefore, it supports those proposals in the *Further Notice* which will advance those aims, including frequency-specific applications and the use of auctions to select among mutually exclusive applications to the maximum extent possible under the law. However, PageNet opposes those proposals which will have the opposite effect, including the retention of application filing windows rather than implementation of a first-come, first-served licensing scheme. Filing windows will increase the number of mutually exclusive applications and will impose unwarranted delays in an applicant's ability to provide service to the public.

Therefore, PageNet urges the Commission to proceed in accordance with the recommendations it has herein set forth.

Respectfully submitted,

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